

**IN THE U.S. DISTRICT COURT FOR MARYLAND,  
SOUTHERN DIVISION**

**BEYOND SYSTEMS, INC.**

Plaintiff

v.

**WORLD AVENUE USA, LLC**  
successor by merger to NIUTECH, LLC.,  
**DBA "THE USEFUL," ET AL.**

Defendants

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**Case No. PJM 08 cv 0921**

**PLAINTIFF'S RESPONSE TO WAUSA'S MOTION TO SEAL,  
AND WAUSA'S SIMULTANEOUS OBJECTION TO SEALING**

Plaintiff consents in part to Defendant WAUSA's motion to seal at docket 129, insofar as the motion requests sealing of certain documents that have been designated as confidential.

Plaintiff contends that any effort to file paper copies (WAUSA refers to "over 100,000 pieces of paper") is excessive and unnecessary, that Plaintiff has not produced any such "pieces of paper," and that filing digital copies of samples should have been sufficient for the points being argued by WAUSA.

Plaintiff objects to WAUSA's request to unseal, and its challenge to sealing, and incorporates by references Plaintiff's filings at docket entries 124, 125 and 126.

/s/

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**Certificate of Service**

I certify that a copy of the foregoing documents was served on the date of ECF filing, via the ECF system, on all counsel of record.

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/s/

Stephen H. Ring